



EPA Region 5 Records Ctr.



259723

W. D. Clinton

Project Manager
1871 North Pershing Road
Waukegan, Illinois 60087
(847) 360-4490

January 30, 2002

Mr. Mike Rafati
Environmental Protection Specialist
United States Environmental Protection Agency - Region V
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Subject: Response to Request for Information for Site 4, Pursuant to Section 104(e) of CERCLA; Johns Manville, 1871 North Pershing Road, Waukegan, Illinois

Dear Mr. Rafati;

This correspondence is sent in response to the United States Environmental Protection Agency (U.S. EPA) Region 5 letter dated May 4, 2001 requesting information pursuant to Section 104(e) of CERCLA for the former Johns Manville¹ (JM) manufacturing plant located at 1871 North Pershing Road in Waukegan, Illinois (the Property). This response was originally due in June 2001. Through a series of extensions given by US EPA, it is our understanding that this response is timely.

The request is in reference to the discovery of asbestos-containing material (ACM) found in the subsurface at a location immediately west of the Property. The discovery area has been designated as "Site 4," and is hereafter referred to as the "Site." Exhibit 1 is a General JM Property Map that also shows the location of the Site. All responses given herein are limited to said Site 4.

¹ Please note that, as of January 15, 2002, the name of the company was changed from "Johns Manville International, Inc." to "Johns Manville."

Questions

1. *Identify all persons consulted in the preparation of the answers to these questions.*

W. Dennis Clinton
Manager of Engineering
Johns Manville
1871 North Pershing Road
Waukegan, Illinois 60087
(303) 808-2127

Bruce D. Ray
Associate General Counsel
Johns Manville
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Denver, Colorado 80202
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B. J. Lemonier
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Johns Manville
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David M. Peterson, P.E., P.C.
3726 Meadowbrook Blvd.
University Heights, Ohio 44118
(216) 554-0413

William A. Bow, C.P.G.
LFR Levine Fricke
630 Tollgate Road, Suite D
Elgin, Illinois 60123
(847) 695-8855

2. *Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions, and provide copies of all such documents.*

The following historical aerial photographs were reviewed in the preparation of this response:

- Exhibit 2: 1946
- Exhibit 3: 1953
- Exhibit 4: 1955

- Exhibit 5: 1972
- Exhibit 6: 1978

The approximate location of the Site has been annotated on each photograph. Copies of the photographs are included as exhibits to this response.

3. *If you have reason to believe that there may be persons able to provide a more detailed or more complete response to any question in this Information Request or who may be able to provide additional responsive documents, identify such persons.*

JM is not aware of other specific persons who are able to provide additional information or documents in response to this Information Request.

4. *List your EPA Identification Numbers.*

US EPA Identification Number: ILD005443544
Illinois Generator No.: 0971900014

5. *Identify the acts or omissions of any person, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants, including Asbestos Containing Materials (ACM), as defined as item 10 of Enclosure 3 (Definitions), and damages resulting therefrom at Site 4 (Site), as defined at item 3 of Enclosure 3 (Definitions).*

JM is not aware of any specific person who has knowledge regarding the generation, transportation, treatment, placement, disposal, or other handling of hazardous substances, including ACM, at the Site.

6. *Identify all persons, including current and former employees of Johns Manville and its contractor and subcontractors, having knowledge or information about the generation, transportation, treatment, placement, disposal, or other handling of hazardous substances, including ACM, at the Site.*

JM is not aware of any specific person who has knowledge regarding the generation, transportation, treatment, placement, disposal, or other handling of hazardous substances, including ACM, at the Site.

7. *Provide copies of all maps, surveys conducted, construction permits, contracts, and other documents relating to the construction of the Site.*

JM is not aware of any maps, surveys conducted, construction permits, contracts, or other documents relating to the construction of the Site. Despite a diligent search, no such documents responsive to this, or any other, question were found, other than the photographs which are exhibits to this response.

8. *Identify all persons, including yourself, who may have arranged for placement, disposal or treatment, or arranged for transportation for placement, disposal or treatment, of waste materials, including hazardous substances and ACM, from the Site.*

JM is not aware of any specific person(s) who may have arranged for placement, disposal or treatment, or arranged for transportation for placement, disposal or treatment, of waste materials, including hazardous substances and ACM, from the Site.

In addition, identify the following:

- a) *Where is the Site located, what are its boundaries;*

The Site is located directly west and slightly south of the JM Guard House, as shown on Exhibit 1.

- b) *What is the extent of the distribution of ACM at the Site;*

The precise extent of the distribution of ACM at the Site is unknown. Soil borings installed in the JM parking area immediately east of the Site did not contain any ACM, per visual inspection of the soil samples. The soil boring locations are shown on Exhibit 7. Copies of the soil boring logs are included as Exhibits 8a, 8b, 8c, 8d, 8e, 8f, 8g, and 8h.

- c) *How was the Site discovered and by whom;*

The Site was discovered on October 26, 2000 while excavating soil to permanently close the natural gas supply line to the Property, which was in connection with demolition of the buildings on the Property. North Shore Gas was present to conduct the excavation and close the line. Pieces of ACM in the form of roofing materials, Transite sheeting, and brake shoe materials were noted in the excavated soil. David M. Peterson of David M. Peterson, PE, PC was present as a representative of JM and observed and photographed the excavated materials. Copies of 2 photographs are presented on Exhibit 9. All excavated materials were returned to the excavation. All ACM exposed at the surface as a result of the excavation was picked up by a licensed asbestos contractor (Omega Demolition Corporation) and placed in one of the roll-off boxes present at the Property in connection with the ongoing building demolition. All ACM from the surface pick-up, as well as the building demolition, was disposed off-site at the Onyx Landfill located in Zion, Illinois.

- d) *Who generated the ACM;*

The ACM was most likely generated by JM at the Waukegan Plant.

- e) *The persons with whom you or such other persons made such arrangements;*

Unknown. JM is not aware of any person who may have arranged for placement, disposal or treatment, or arranged for transportation for placement, disposal or treatment, of waste materials, including hazardous substances and ACM, at the Site.

- f) *Every date on which such arrangements took place;*

Unknown. JM is not aware of any records that describe when placement of the fill materials may have occurred. However, review of historical aerial photographs shows that, with one exception (as described below), the western edge of the parking lot was substantially unchanged after 1946. Exhibit 10 is an overlay map showing the current Property features overlaying the 1946 aerial photograph. The map shows that, in 1946, the western limit of the parking/driveway area appears to extend to its present-day limit. This also roughly corresponds with the western JM Property line. As the elevation of the Site 4 area is no higher today than the surrounding drive and parking areas, it is unlikely that any fill material has been placed since 1946.

The exception was during the early 1970s, when a temporary access road to the JM Property from Greenwood Avenue was constructed (presumably by the Illinois Department of Transportation [IDOT]) during construction of the Amstutz Expressway. Exhibit 11 is an overlay map showing the current Property Features overlaying the 1972 aerial photograph. The map shows that the temporary road entered the Property from the west at a location immediately north of the Site. JM has no knowledge of whether IDOT's construction of the temporary access road affected the distribution of ACM in the area of Site 4.

- g) *For each transaction, the nature of the hazardous substances, including ACM, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- h) *The owner of the hazardous substances, including ACM, so placed, accepted or transported;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- i) *The quantity of the hazardous substance, including ACM, involved (weight or volume) in each transaction and the total quantity for all transactions;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- j) *All tests, analyses, and analytical results concerning the hazardous substances, including ACM;*

No analytical tests have been conducted on the ACM discovered at the Site. The ACM was identified as "asbestos-containing" by persons familiar with the presence of asbestos in the types of building materials that were identified during excavation of the Site for the natural gas line decommissioning.

- k) *The persons(s) who selected the location to which the hazardous substances, including ACM, were to be transported and/or placed;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- l) *The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- m) *Where the person identified in g, above, intended to have such hazardous substances, including ACM, transported and all evidence of this intent;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- n) *Whether the hazardous substances, including ACM, involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- o) *What was actually done to the hazardous substances, including ACM, once they were brought to the Site;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- p) The final disposition of each of the hazardous substances, including ACM, involved in such transactions;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- q) The measures taken by the Respondent to determine the actual methods, means, and site of treatment or disposal of the hazardous substances, including ACM, involved in each transaction;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- r) The type and number of containers in which the hazardous substances, including ACM, were contained when they were accepted for transport, where the containers were disposed, and all marking on such containers;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- s) The price paid for (i) transport, (ii) disposal, (iii) placement, or (iv) any combination of the above for each hazardous substance, including ACM;*

Unknown. JM is not aware of any arrangements to place, dispose, or treat waste materials, including hazardous substances and ACM, at the Site.

- t) All documents containing information responsive to a – o above, or in lieu of identification of all relevant documents, provide copies of all documents;*

JM is not aware of any maps, surveys conducted, construction permits, contracts, or other documents relating to the construction of the Site. Despite a diligent search, no such documents responsive to this, or any other, question were found, other than the photographs which are exhibits to this response.

- u) All persons with knowledge, information, or documents responsive to a – p above.*

JM is not aware of any specific person who may have arranged for placement, disposal or treatment, or arranged for transportation for placement, disposal or treatment, of waste materials, including hazardous substances and ACM, from the Site.

9. *Does Johns Manville have any records or knowledge of locations, other than Site 1, 2, 3, and 4, where ACM deriving from the Johns Manville facility has been placed? Identify all such locations;*

Other than Sites 1, 2, 3, and 4, JM is aware of the presence of ACM at the following locations:

- a) JM is aware that ACM has been discovered on the Lake Michigan beach in the vicinity of the JM property, Illinois Beach State Park, and the Nature Preserve at Illinois Beach State Park. JM is aware that some of the ACM may have been manufactured at the JM facility, but JM has no knowledge of any JM activities that resulted in ACM being placed in these areas.
- b) The former JM disposal area, located on the JM property to the east of the former manufacturing buildings. This ACM was extensively documented in the RI/FS for the NPL Site remediation effort.
- c) Beneath, and in areas immediately adjacent to the former manufacturing buildings, which were demolished during 2000-2001.
- d) The shoulders of Greenwood Avenue, in the vicinity of Site 3, as identified on Exhibit 12 as "Greenwood Avenue Shoulder." This ACM was identified during due diligence activities being conducted by the Waukegan Park District (WPD), in preparation of possibly acquiring the area formerly occupied by the JM manufacturing buildings. The report documenting these materials is being prepared by the WPD. When its findings are made available, JM will update this response as necessary.
- e) The area located directly north of Site 4 and west of the western JM parking lot, as identified on Exhibit 12 as the "Swale." This ACM was identified during due diligence activities being conducted by the Waukegan Park District (WPD), in preparation of acquiring the area formerly occupied by the JM manufacturing buildings. The report documenting these materials is being prepared by the WPD. When its findings are made available, JM will update this response as necessary.

Exhibit 12 is a compilation of all such areas known by JM to contain ACM.

10. Does Johns Manville know of anyone with knowledge of ACM placement on the Johns Manville facility, adjacent to the facility or elsewhere in the vicinity of the facility? If the answer is "yes" provide the name, address, and phone number for any such individuals.

Gary Lundholm, a retired JM employee, may be able to provide information regarding activities at Site 1. He may be reached at (847) 662-7807. Contact information regarding Sites 2 and 3 has previously been made available to USEPA. Placement of ACM on the JM facility was extensively documented in the RI/FS for the NPL Site remediation effort. JM is not aware of any other specific individuals with knowledge concerning the historical placement of ACM on, adjacent to, or in the vicinity of the facility.

Certification

I certify under penalty of law that this response and all exhibits were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please contact me with any questions at (303) 808-2127.

Sincerely,

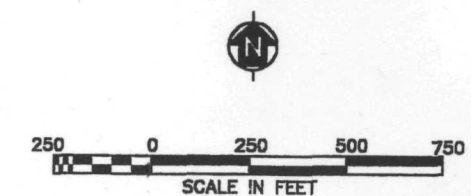
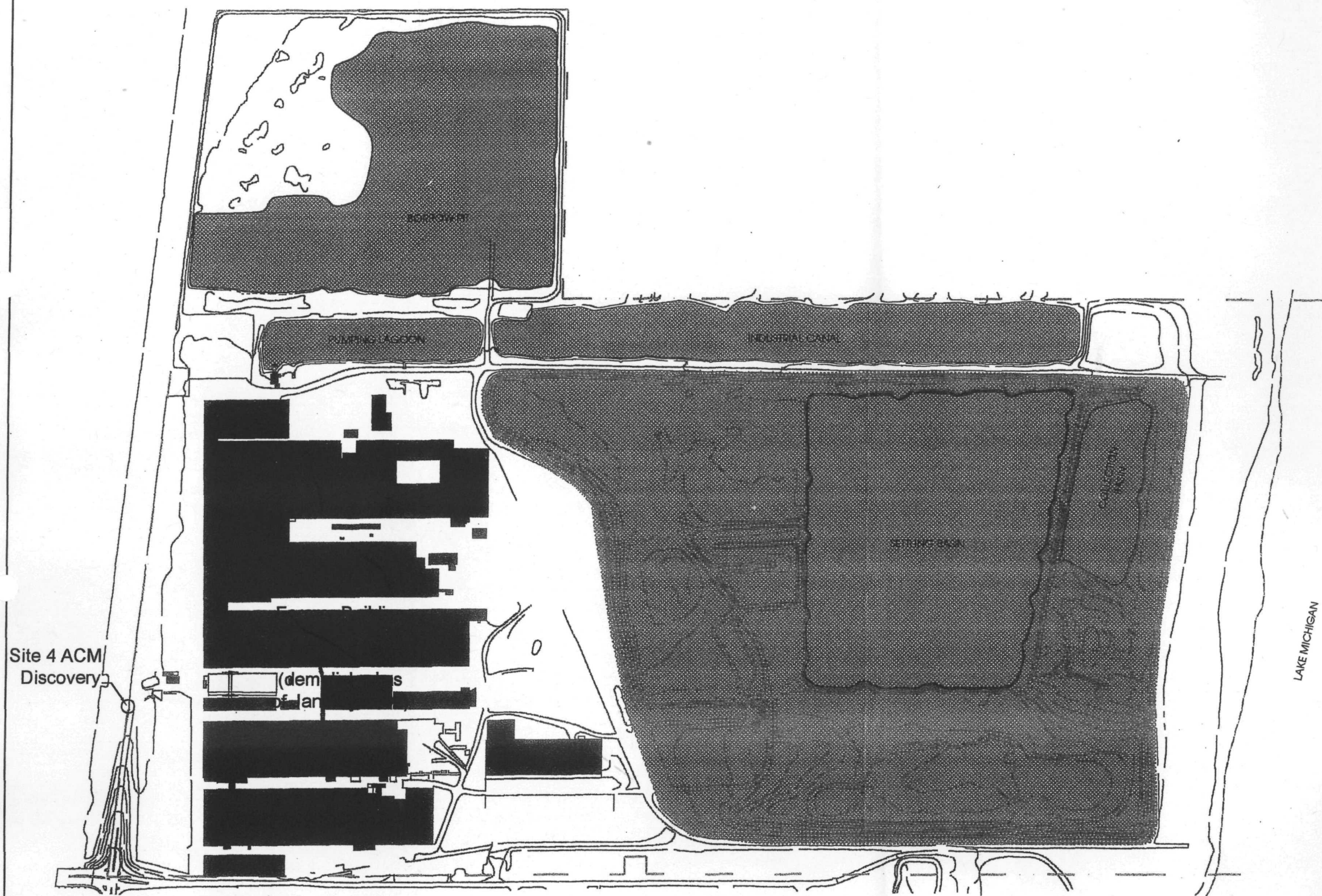
A handwritten signature in black ink, appearing to read 'W.D. Clinton', with a stylized flourish at the end.

W. D. Clinton
Project Manager

cc: Bruce D. Ray
William A. Bow
David M. Peterson

Exhibits enclosed:

- Exhibit 1: General JM Property Map
- Exhibit 2: 1946 Aerial Photograph
- Exhibit 3: 1953 Aerial Photograph
- Exhibit 4: 1955 Aerial Photograph
- Exhibit 5: 1972 Aerial Photograph
- Exhibit 6: 1978 Aerial Photograph
- Exhibit 7: Soil Boring Locations
- Exhibit 8: Soil Boring Logs (8a through 8h)
- Exhibit 9: Photographs of Natural Gas Line Excavation
- Exhibit 10: 1946 Aerial Photograph and Current Site Features
- Exhibit 11: 1972 Aerial Photograph and Current Site Features
- Exhibit 12: ACM Areas and Sites Known to JM as of January 30, 2002



--- Property Line

JOHNS MANVILLE, WAUKEGAN, ILLINOIS
GENERAL PROPERTY MAP



0 300
Scale Approximate

Johns Manville - Waukegan, Illinois

July 1946
Aerial Photograph
Site 4 ACM Discovery

LFR
LEVINE • FRICKE

Exhibit 2



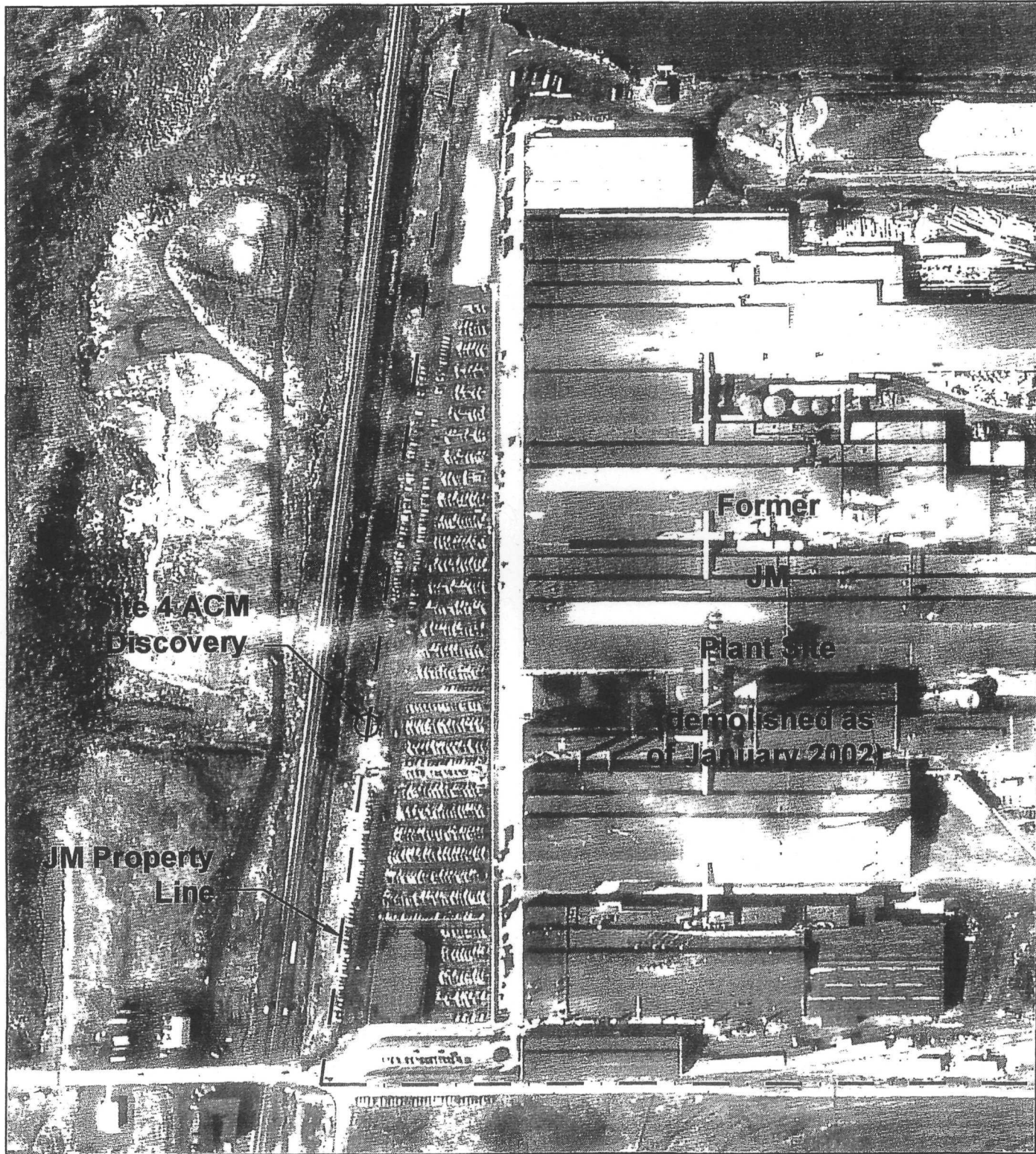
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Scale Approximate

Johns Manville - Waukegan, Illinois

May 1953
Aerial Photograph
Site 4 ACM Discovery

LFR
LEVINE • FRICKE

Exhibit 3



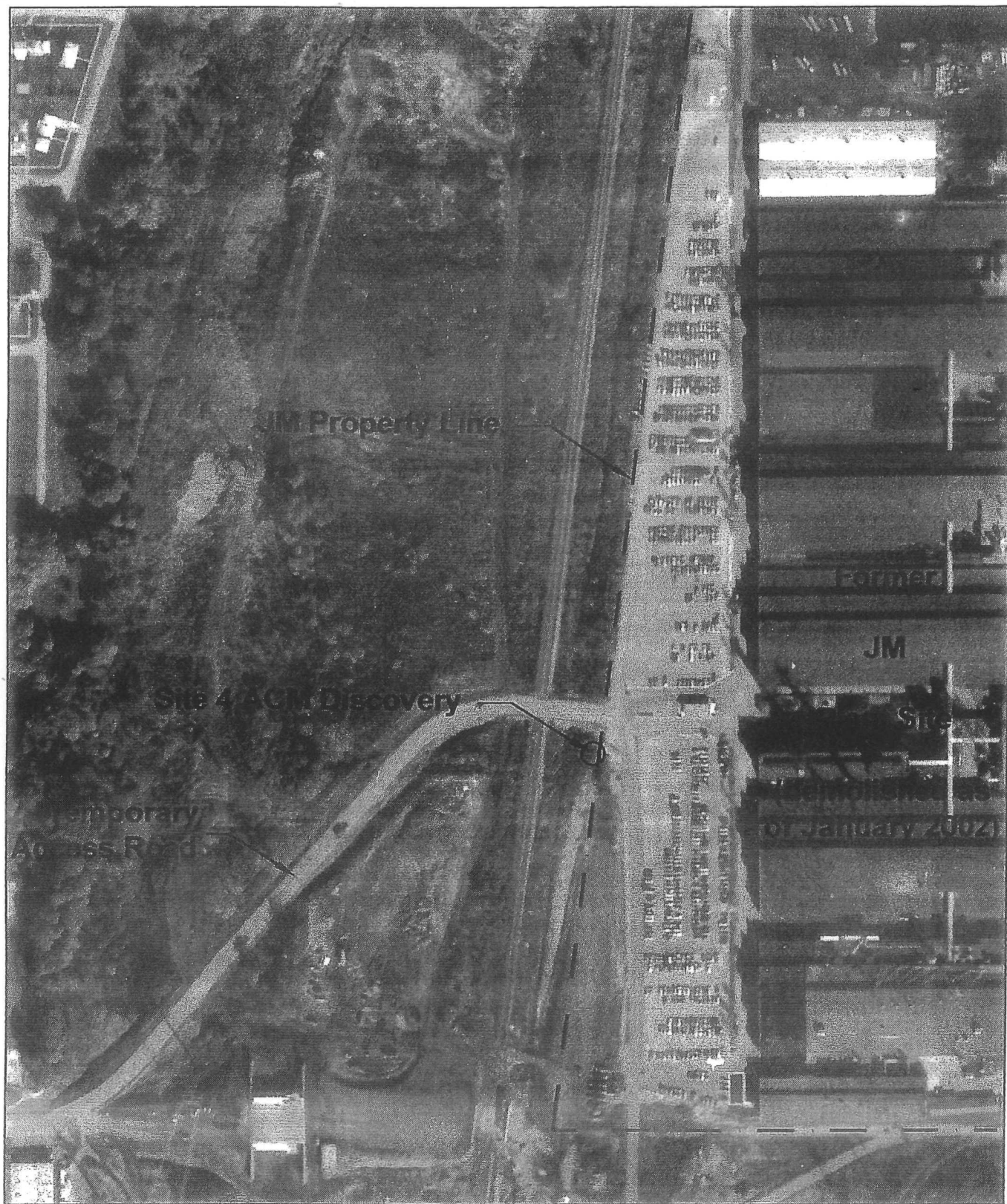
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Scale Approximate

Johns Manville - Waukegan, Illinois

March 1955
Aerial Photograph
Site 4 ACM Discovery

LFR
LEVINE • FRICKE

Exhibit 4



Johns Manville - Waukegan, Illinois

October 1972
Aerial Photograph
Site 4 ACM Discovery



0 300
Scale Approximate

LFR
LEVINE • FRICKE

Exhibit 5



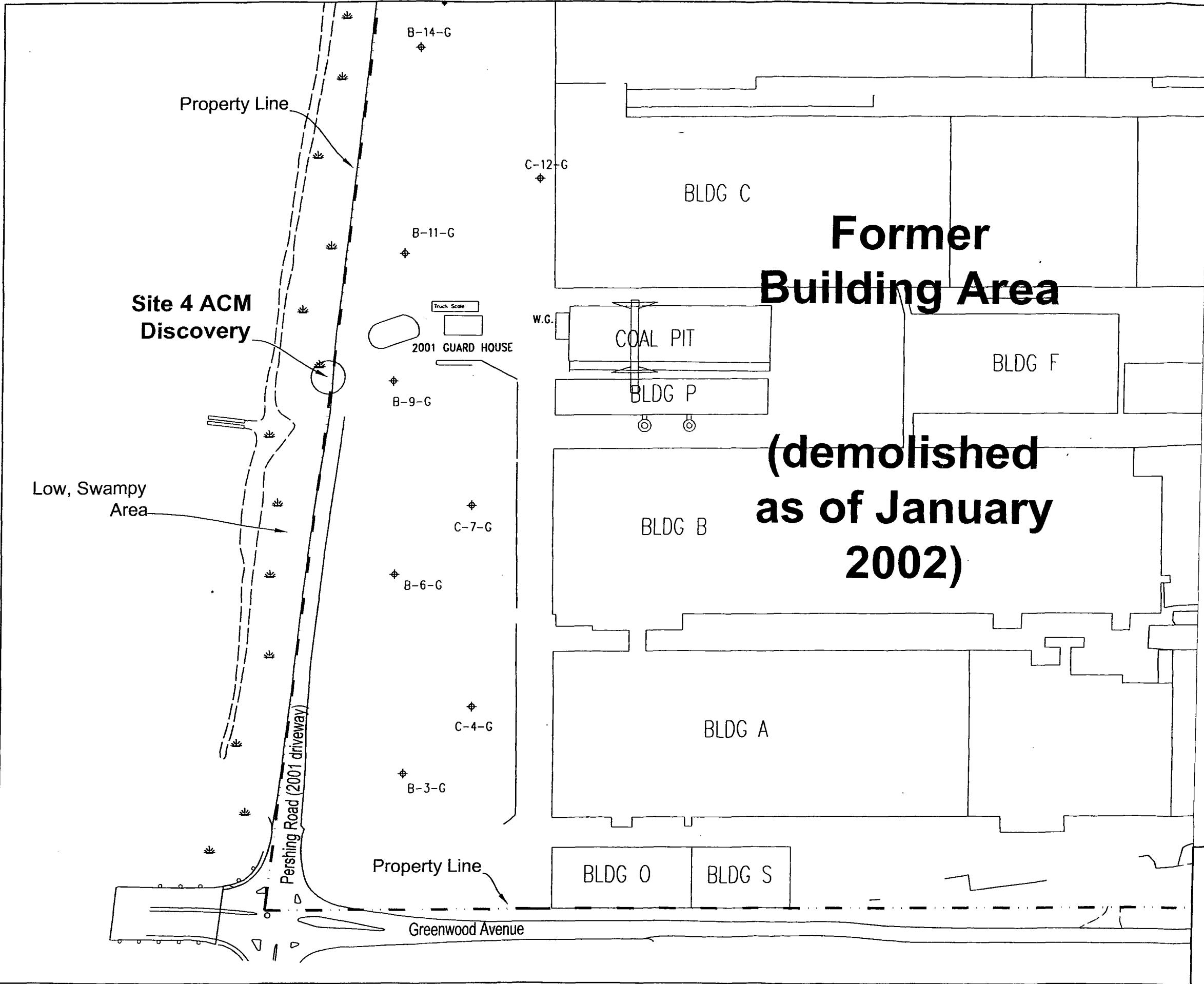
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Scale Approximate

Johns Manville - Waukegan, Illinois

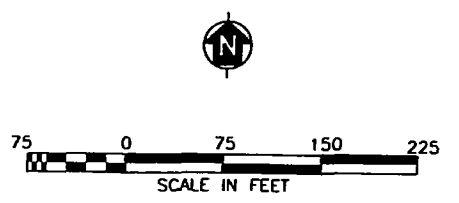
October 1978
Aerial Photograph
Site 4 ACM Discovery

LFR
LEVINE • FRICKE

Exhibit 6





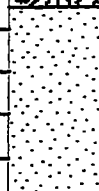
- Low, swampy area
- Property Line
- Soil Boring



JOHNS MANVILLE, WAUKEGAN, ILLINOIS
**Site 4 and
Soil Boring Locations**

Log of Borehole: B-3-G

 DLFR LEVINE-FRICKE	Client: Johns Manville		Project: Johns Manville		Project No: 6779.00	
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:		Date Start: 12/14/98
	Surface Conditions: Asphalt					Date End: 12/14/98
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN	


SAMPLE DATA				SUBSURFACE PROFILE			
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Symbol	Soil Description	Remarks
1	Tube	75		0		Ground Surface No recovery 0-1'	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4' macrotube.
				1		Fill material, gravelly sand, well rounded and sub-angular gravel, poorly graded, black, dry, no visible suspect ACM.	
				2		Sand, yellowish brown (10YR 4/6), dry to moist, fine grain, trace gravel, no suspect ACM present.	
				3		End of Borehole	
				4			
				5			
				6			

Log of Borehole: B-6-G

OLFR LEVINE-FRICKE	Client: Johns Marville		Project: Johns Marville		Project No: 6779.00
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:	Date Start: 12/14/98
	Surface Conditions:				Date End: 12/14/98
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN

SAMPLE DATA				SUBSURFACE PROFILE		
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Soil Description	Remarks
				0	Ground Surface	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4' macrotube.
				0 - 1	Gravelly sand, black, fill material, dry, well graded gravel, rounded to sub-angular, no suspect ACM present	
				1 - 2		
				2 - 3		
				3 - 4	Sand, yellowish brown (10YR 4/6), dry to moist, fine grain sand, well rounded gravel, no suspect ACM present.	
				4	End of Borehole	
				5		
				6		

Log of Borehole: B-9-G


	Client: Johns Manville		Project: Johns Manville		Project No: 6779.00	
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:		Date Start: 12/14/98
	Surface Conditions:					Date End: 12/14/98
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN	

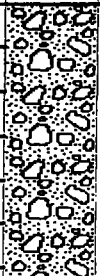
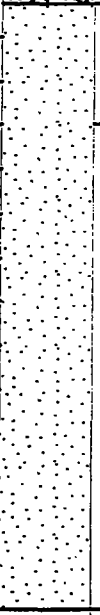
SAMPLE DATA					SUBSURFACE PROFILE		
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Symbol	Soil Description	Remarks
				0		Ground Surface	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4" macrotube.
				0		Gravelly sand, black, fill material, well graded gravel, sub-angular, dry, no suspect ACM present	
1	Tube	80		2		Sand, yellowish brown (10YR 4/6), dry to moist, fine grain sand, trace gravel, no suspect ACM present.	
				4		End of Borehole	
				5			
				6			

Log of Borehole: B-11-G

OLFR LEVINE-FRICKE	Client: Johns Marville		Project: Johns Marville		Project No: 6779.00	
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:	Date Start: 12/14/98	
	Surface Conditions:				Date End: 12/14/98	
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN	
SAMPLE DATA			SUBSURFACE PROFILE			
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Soil Description	Remarks
				0	Ground Surface	
				0	Gravelly sand fill material, well graded, brown, well rounded, sub-angular. no suspect ACM present	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4' macrotube.
				1		
				2		
				3	Sand, yellowish brown (10YR 5/4), dry to damp, very fine grain, trace small round gravel, no suspect ACM present.	
				4	End of Borehole	
				5		
				6		

Log of Borehole: B-14-G


 LEVINE•FRICKE	Client: Johns Manville		Project: Johns Manville		Project No: 6779.00	
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:		Date Start: 12/14/98
	Surface Conditions:					Date End: 12/14/98
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN	

SAMPLE DATA					SUBSURFACE PROFILE		
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Symbol	Soil Description	Remarks
1	Tube	80		0		Ground Surface	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4' macrotube.
						Gravelly fill material, poorly graded, well rounded, sub-angular, no suspect ACM present	
				1		Sand, brown (10YR 3/3), dry to damp, well rounded small gravel, no suspect ACM	
				2			
				3		Sand, yellowish brown (10YR 5/4), dry to wet at 3', trace cobble, well rounded, very fine grain, no suspect ACM present	
			4	End of Borehole			
				5			
				6			

Log of Borehole: C-4-G

OLFR LEVINE-FRICKE	Client: Johns Manville		Project: Johns Manville		Project No: 6779.00		
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:	Date Start: 12/14/98		
	Surface Conditions:				Date End: 12/14/98		
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN		
SAMPLE DATA				SUBSURFACE PROFILE			
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Symbol	Soil Description	Remarks
				0		Ground Surface	
						Gravelly sand fill material, brown, dry to damp, poorly graded pea gravel, no suspect ACM present	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4' macrotube.
				1			
						Sand, yellowish brown (10YR 5/8), dry to moist, trace of clay high plasticity, soft, very fine grain sand	
				2			
						Sand, yellowish brown (10YR 5/4), damp to dry, very fine grain, no suspect ACM present	
				3			
				4			
						End of Borehole	
				5			
				6			
				7			

Log of Borehole: C-7-G

	Client: Johns Manville		Project: Johns Manville		Project No: 6779.00	
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:	Date Start: 12/14/98	
	Surface Conditions:				Date End: 12/14/98	
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN	
SAMPLE DATA					SUBSURFACE PROFILE	
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Soil Description	Remarks
1	Tube	80		0	Ground Surface	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4' macrotube.
					Gravelly fill material, poorly graded gravel, dry, no suspect ACM present	
					Sand, dark brown (10YR 3/3), dry to moist, fine grain sand, gravel present, no suspect ACM	
					Sand, yellowish brown (10YR 5/4), dry to moist, very fine grain, no suspect ACM present	
				4	End of Borehole	
				5		
				6		

Log of Borehole: C-12-G

OLFR LEVINE-FRICKE	Client: Johns Marville		Project: Johns Marville		Project No: 6779.00	
	Project Location: Waukegan, IL		Total Depth: 4	Elevation:	Date Start: 12/14/98	
	Surface Conditions:				Date End: 12/14/98	
Drilling Contractor: Rock & Soil			Driller: J. Working		Geologist/Engineer: JSN	
SAMPLE DATA				SUBSURFACE PROFILE		
Sample Number	Sample Type	Recovery (%)	PID/FID (ppmv)	Depth (ft)	Symbol	Remarks
				0	Ground Surface	
					Sandy gravelly fill material, brown, damp to dry, well graded, no suspect ACM present	Boring advanced with a direct push soil probe. Continuously sampled with a 2" by 4' macrotube.
				1		
				2		
				3		
					Sand, yellowish brown (10YR 5/4), dry, loose, very fine grain, no suspect ACM present	
				4		
					End of Borehole	
				5		
				6		
				7		
				8		
				9		



Exhibit 9a

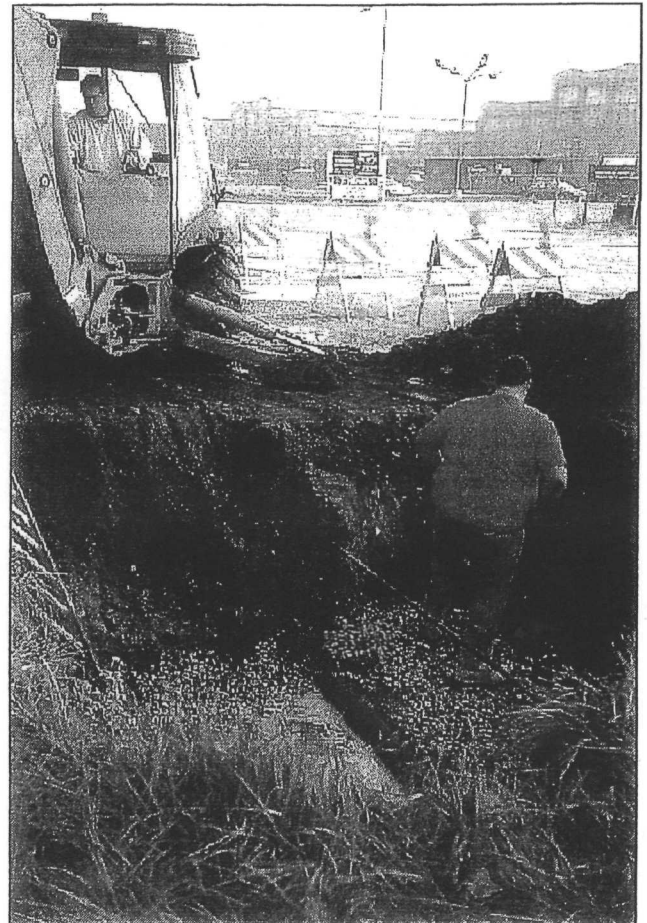
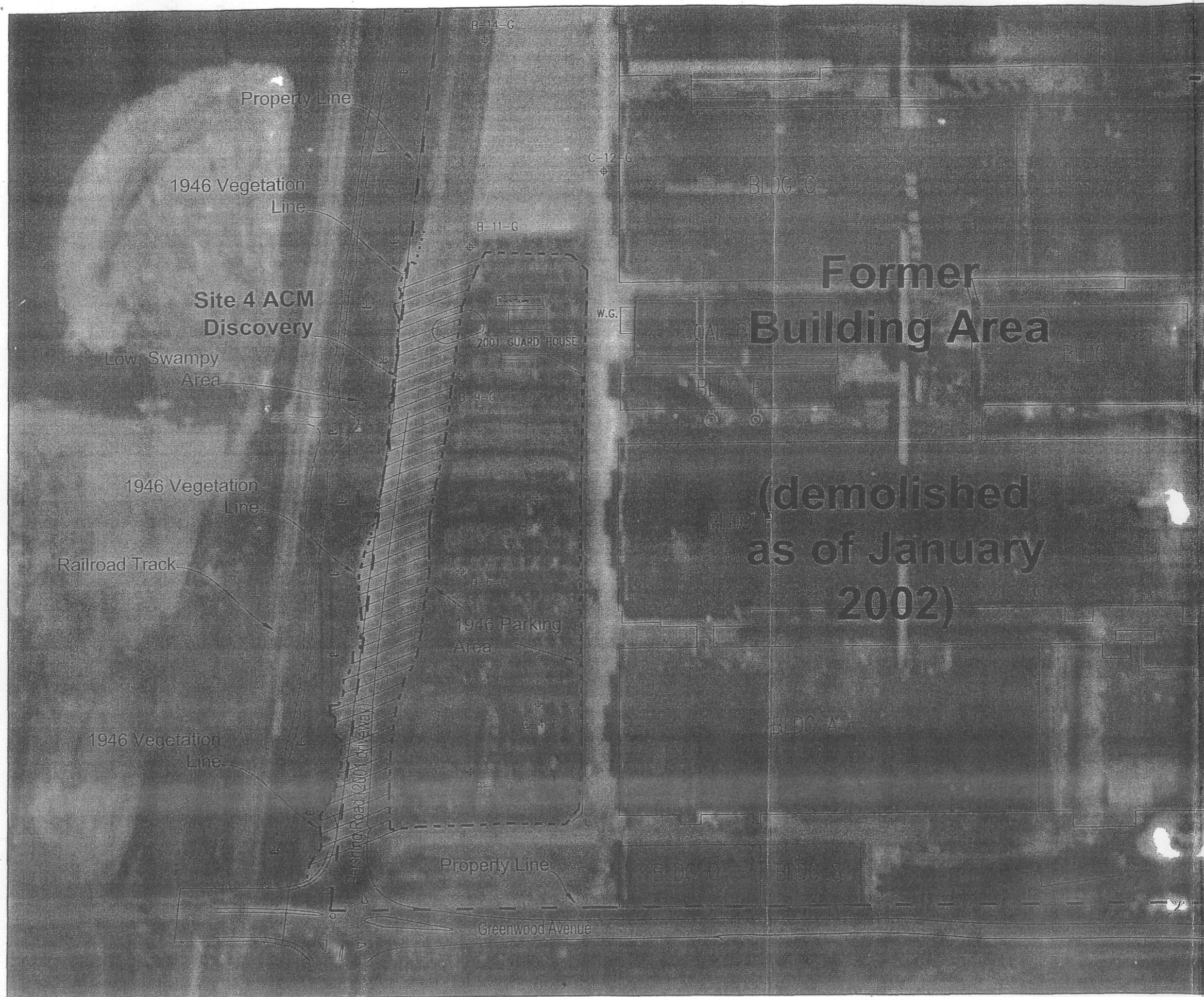




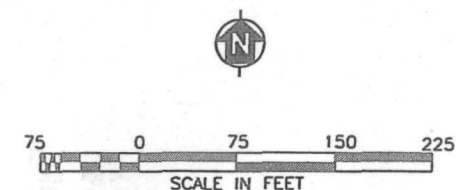


Exhibit 9b

Johns Manville - Waukegan, Illinois
 October 26, 2000
 Natural Gas Line Excavation
 Site 4 ACM Discovery



-  Low, swampy area
-  1946 Driveway/Parking Area
-  Property Line
-  Soil Boring

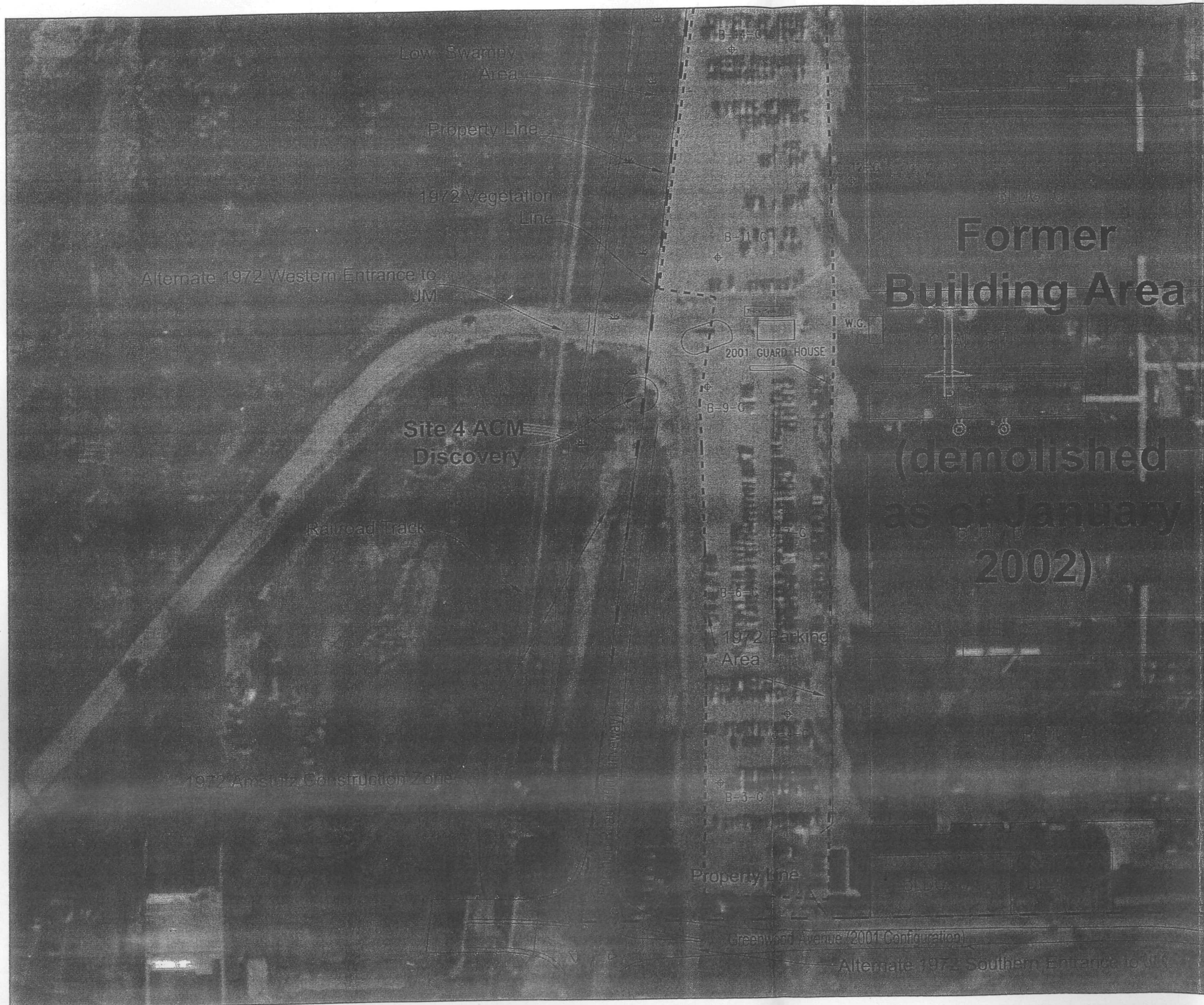





JOHNS MANVILLE, WAUKEGAN, ILLINOIS

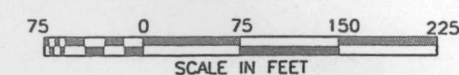
Site 4
Current Site Features
and 1946 Aerial Photograph

LFR
LEVINE • FRICKE

Exhibit 10

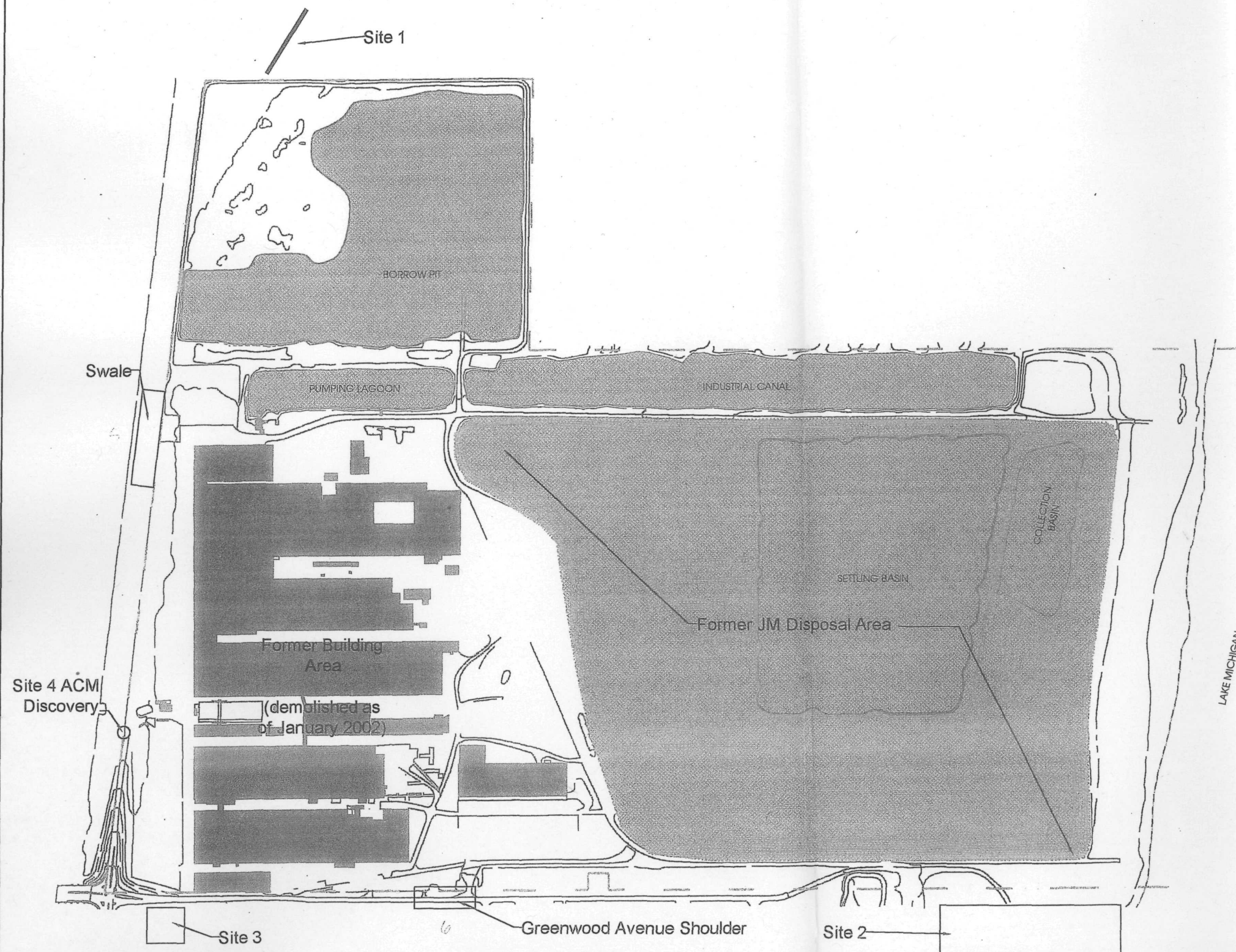


-  Low, swampy area
-  Property Line
-  Soil Boring



JOHNS MANVILLE, WAUKEGAN, ILLINOIS
Site 4
Current Site Features
and 1972 Aerial Photograph





JOHNS MANVILLE, WAUKEGAN, ILLINOIS

**General Property Map and
Approximate Location of
ACM Areas and Sites**



Exhibit 12